

**To:** Valentino, Michael[Valentino.Michael@epa.gov]  
**Cc:** Cunningham, Michael[cunningham.michael@epa.gov]  
**From:** Lee, Jae  
**Sent:** Thur 3/2/2017 4:01:19 PM  
**Subject:** RE: Tradebe Inspection

Thanks, mike, your Engineering mind would enlight this project.

I am not sure how easily we can obtain the mass balance dat of other cases. I can try to get more infor for Reinco and US Ecology (Texas).

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**From:** Valentino, Michael  
**Sent:** Thursday, March 02, 2017 9:31 AM  
**To:** Lee, Jae <lee.jae@epa.gov>  
**Cc:** Cunningham, Michael <cunningham.michael@epa.gov>  
**Subject:** RE: Tradebe Inspection

Ok great. Mike Galbraith can see the facility has been actively monitored for years.

I've been giving some thought as to how we can go about gathering industry data on solvent reclamation processes – if we can get that info, we can compare typical industry yields vs the SDS yield (basically mass of reclaimed solvent ÷ mass of solvent introduced to SDS). Maybe we can brainstorm on going about that.

Also, after we get Tradebe's info maybe we should do a site visit, especially if we still have questions about the process. I am sure Tita would be happy to give us a demonstration of the SDS. They are proud of that system. I don't recall us asking but I'm interested in knowing what is the % of "water" from the OWS to Tank 51 that is actually converted into fuels for Essroc and Cadence. Is this mostly water w/ trace amounts of immiscible solvents or does it have a fairly high solvent concentration (and BTU value) right out of Tank 51?

Well, we have a lot of work ahead of us it seems.

Michael

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**From:** Lee, Jae  
**Sent:** Thursday, March 02, 2017 9:22 AM  
**To:** Valentino, Michael <Valentino.Michael@epa.gov>  
**Cc:** Cunningham, Michael <cunningham.michael@epa.gov>  
**Subject:** RE: Tradebe Inspection

Thanks, mike.

Mike Cunningham pulled out this RCRA inspection information. Cora gave me a ECHO data also. The ECHO would include air program inspection.

Jae

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**From:** Valentino, Michael  
**Sent:** Thursday, March 02, 2017 9:19 AM  
**To:** Lee, Jae <lee.jae@epa.gov>  
**Cc:** Cunningham, Michael <cunningham.michael@epa.gov>  
**Subject:** RE: Tradebe Inspection

Thanks for doing this Jae. Cora did a RCRAInfo pull for me yesterday and I was going to compile the same information for you.

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**From:** Lee, Jae  
**Sent:** Thursday, March 02, 2017 9:03 AM

**To:** Galbraith, Michael <[Galbraith.Michael@epa.gov](mailto:Galbraith.Michael@epa.gov)>

**Cc:** Chow, Kevin <[chow.kevin@epa.gov](mailto:chow.kevin@epa.gov)>; Valentino, Michael <[Valentino.Michael@epa.gov](mailto:Valentino.Michael@epa.gov)>; Setnicar, Mary <[Setnicar.Mary@epa.gov](mailto:Setnicar.Mary@epa.gov)>; Cunningham, Michael <[cunningham.michael@epa.gov](mailto:cunningham.michael@epa.gov)>

**Subject:** RE: Tradebe Inspection

RCRAinfo indicates that State has conducted CEI (Compliance and Evaluation Inspection) on 9/22/16, 1/7/16, 5/12/15, 10/15/14, 11/05/13, 9/27/13, 6/14/12, 6/21/11, 3/30/11, 12/17/09, 3/03/09 ....

The evaluation list is attached.

It is not known whether these inspection ever included the TDU areas, but most unlikely since the TDU is RCRA-exempted unit. I can check with IDEM inspector for this.

Do you also need an Air Inspection dates done by Air program?

Jae

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**From:** Galbraith, Michael

**Sent:** Wednesday, March 01, 2017 1:08 PM

**To:** Lee, Jae <[lee.jae@epa.gov](mailto:lee.jae@epa.gov)>

**Subject:** RE: Tradebe Inspection

Thanks jae!

Mike Galbraith  
Permits Branch (5303P)  
Program Implementation/Information Division  
Office of Resource Conservation and Recovery  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

(703) 605-0567

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**From:** Lee, Jae

**Sent:** Wednesday, March 01, 2017 1:39 PM

**To:** Galbraith, Michael <[Galbraith.Michael@epa.gov](mailto:Galbraith.Michael@epa.gov)>

**Cc:** Valentino, Michael <[Valentino.Michael@epa.gov](mailto:Valentino.Michael@epa.gov)>

**Subject:** Tradebe Inspection

I am contacting with IDEM inspector how many inspection have been conducted over years.

And whether the inspection includes the exempted TDU.

I think the NEIC conducted an inspection on 11/3-7, 2014.

I will let you know when I have more information for this.

Jae